

# EXHIBIT A



**U.S. Department of Justice**

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Western District of New York*

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June 16, 2022

**Via Email and Hand-Delivery**

MaryBeth Covert, AFPD  
Sonya Zoghlin, AFPD  
Anne Burger, AFPD  
300 Pearl Street, Suite 200  
Buffalo, New York 14202

RE: **United States v. Payton Gendron**  
**22-mj-124**

Dear Counselors:

Pursuant to Rules 12 and 16 of the Federal Rules of Criminal Procedure and the government's agreement to provide voluntary discovery in this matter, enclosed are documents, videos, and photos, which are contained in the enclosed thumb drive in the following folders:

Apology Letter to Family from Gendron Bedro...	BPD Bodycam
Bushmaster ATF 4473	Bushmaster Photos w Writings
Bushmaster Receipt	Copy of Manifesto from Laptop
Crime Scene Exhibit with identity of victims	Crime Scene_Booking_Evidence Reports
Death Certificates	Discord Records_14 May 2022
Gendron Discord Post May 14_2022	Gendron Discord To-Do List (provided by KS)
Gendron ID_Mossberg Purchase	Gendron Sales Receipt_ Mossberg
Gendron School Records	GoPro Video
Interview_Gendron	iPhone Notes re Payton
Items from Residence	Mossberg ATF 4473
NYSP Body Camera Footage_March 8, 2022	Online Manifesto
Photos of Laptop	Receipts from Tops May 13_2022
Savage Arms 4473 and Receipt from Dicks	Shotgun Photos and FBI report
Sketch #2 of Tops from Gendron Bedroom	Sketch of Tops from Gendron Bedroom
Speeding Ticket Info	State SW_Vehicle_GoPro_Phone
Text Thread re Payton Gendron_ May 13-14_20...	Thumbdrive Documents
Tops Receipt March 8, 2022	

As you are aware, discovery is voluntary at the complaint stage, but we have provided a substantial amount of information for your review. If you have any questions or concerns, please reach out to us at any time.

Additionally, as you are aware, some of the charges alleged in the complaint carry the possibility of the death penalty. Therefore, we would like to have an initial mitigation presentation from you at the United States Attorney's Office on **July 18, 2022, at 10 a.m.** Of course, you would not be precluded from providing additional mitigation information after that date, and/or having additional mitigation conversations and/or meetings.

Very truly yours,

TRINI ROSS  
United States Attorney

BY: Joseph M. Tripi  
Brett A. Harvey  
Brendan T. Cullinane  
Assistant United States Attorneys

KRISTEN M. CLARKE  
Associate Attorney General, Civil Rights Division

BY: Shan Patel  
Trial Attorney

Enclosure